

California Energy Commission  
Attn: Docket # 01-BSTD-1  
[Trygg@energy.state.ca.us](mailto:Trygg@energy.state.ca.us)  
Contact: John Herzog, VP, Public Policy  
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## Comments of the Air Conditioning Contractors of America

### Proposed Building Standards Of the California Energy Commission

The Air Conditioning Contractors of America is a nationwide trade association that represents the technical, educational and policy interests of those who design, install and maintain heating, ventilation, air conditioning and refrigeration systems.

We appreciate the opportunity to submit these comments on the 2005 Energy Efficiency Standards for Residential and Non-Residential Buildings.

Our comments effect Sections 144 and 150, and Appendix 1-A.

Subchapter 5 – Nonresidential, High-Rise Residential, and Hotel/Motel Occupancies – Performance and Prescriptive Compliance Approaches for Achieving Energy Efficiency  
Section 144 – Page 106

Under Subsection (b) 2. Heating and cooling loads. You reference the ASHRAE Handbook but not Manual J, which of course is referenced in Subchapter 7 and the Appendix. We recommend you reference Manual J as being more specific than “or as specified in a method approved by the commission” as Manual J is universally recognized as the best and certainly most easily understood approach to calculating heating and cooling loads. There are few, if any, alternatives. Since you mention the ASHRAE Handbook by name, you should also mention Manual J by name (as you know Manual J is based upon ASHRAE algorithms. Furthermore, the new Manual J is applicable to low rise buildings of three stories or less, regardless of use as residential or commercial structures. By definition, this category – especially Hotel/Motel – could very well include buildings of three stories or less (High-Rise Residential is defined as four or more habitable stories).

Subchapter 7– Low-Rise Residential Buildings – Mandatory Features and Devices –  
Section 150 - Page 134

Under (h) C. – We recommend you add Manual D – Residential Duct Systems - that is a companion piece to Manual J (which you acknowledge). Manual D is critical to the proper installation of duct systems to complement the proper sizing of the equipment

(continued)

using Manual J. Without the specifics outlined in Manual D, the home or small business owner is not getting the full benefit of proper sizing. As you may know, Manual D was recently ANSI approved. As Manual J, Manual D is highlighted in the ICC and IAPMO codes.

Appendix 1-A – Page 170

#### Standards Referenced in Energy Efficiency Regulations

Under our listing – Air Conditioning Contractors of America – we would recommend you add Manual D – Residential Duct Systems – for the above stated reasons.

Finally, please update our address in the Appendix (page 170)

Our address since November, 2000, has been 2800 Shirlington Road, Suite 300, Arlington, VA 22206. The telephone is 703-575-4477, fax is 703-575-9101. The email address is also different. Should be [www.acca.org](http://www.acca.org), then hit the button for the ACCA Online Store.

We appreciate the opportunity to submit these comments. Please call if you need additional information.